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 30 JANI-KING OF CALIFORNIA, INC., JANI-KING, INC.,
 31 and JANI-KING INTERNATIONAL, INC.

32
 33 UNITED STATES DISTRICT COURT
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 35 NORTHERN DISTRICT OF CALIFORNIA
 36
 37 SAN FRANCISCO DIVISION

38 CESAR GARCIA, an individual,)	No. 3-10-CV-05477 RS
)	
39 Plaintiff,)	PARTIES' STIPULATION FOR
40 v.)	FILING OF PLAINTIFF'S FIRST
)	AMENDED COMPLAINT;
41 JANI-KING OF CALIFORNIA, INC., a Texas)	[PROPOSED] ORDER
42 corporation; JANI-KING, INC., a Texas)	
43 corporation; JANI-KING INTERNATIONAL,)	
44 INC., a Texas corporation; and DOES 1 through)	
45 100, inclusive,)	
)	
46 Defendants.)	
)	

STIPULATION

IT IS HEREBY STIPULATED by Plaintiff Cesar Garcia (“Plaintiff”) and Defendants Jani-King of California, Inc., Jani-King, Inc. and Jani-King International, Inc. (“Defendants”), through their counsel, as follows:

- 1) Plaintiff wishes to file a First Amended Complaint;
- 2) All parties have reviewed Plaintiff's proposed First Amended Complaint, a copy of which is attached hereto as Exhibit 1 with all proposed new allegations set forth in bold;
- 3) Plaintiff contends that the proposed amendment is necessary and proper to allow him to recover all damages he suffered related to the subject matter in a single lawsuit;
- 4) Defendants hereby agree to the filing of Plaintiff's First Amended Complaint in this action; and
- 5) All parties agree that Defendants will have until April 15, 2011 to file an Answer or Rule 12(b) motion in response to Plaintiff's First Amended Complaint.

Date: March 28, 2011

THE LAW OFFICES OF DANIEL FEDER

/S/
DANIEL L. FEDER
Attorney for Plaintiff
CESAR GARCIA

Date: March 28, 2011

BARTKO, ZANKEL, TARRANT & MILLER

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/S/
BENJAMIN RILEY
Attorneys for Defendants JANI-KING OF
CALIFORNIA, INC., JANI-KING, INC.,
and JANI-KING INTERNATIONAL, INC.

1 **[PROPOSED] ORDER**
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BASED ON THE FOREGOING, Plaintiff is authorized to file his First Amended
Complaint, and Defendants shall file their response to the First Amended Complaint on or before
April 15, 2011.

5 **IT IS SO ORDERED.**
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Date: March 28, 2011
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Richard Seeborg
United States District Judge